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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:
PG&E CORPORATION,
- and -
**PACIFIC GAS AND ELECTRIC
COMPANY,**
Debtors.
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF RICHARD W. SLACK IN
SUPPORT OF DEBTORS' OBJECTION TO CLASS
REPRESENTATIVE'S MOTION TO EXTEND
APPLICATION OF FEDERAL RULE OF CIVIL
PROCEDURE 23 TO CLASS PROOF OF CLAIM**

Date: November 19, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Richard W. Slack, hereby declare as follows:

2 1. I am a partner at the law firm Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New
3 York, New York 10153, counsel for the Debtors in the above-captioned action. I am admitted to this
4 Court *pro hac vice* and respectfully submit this declaration in support of the Debtors' Objection to Class
5 Representative's Motion to Extend Application of Federal Rule of Civil Procedure 23 to Class Proof of
6 Claim.

7 2. The matters set forth below are of my own personal knowledge or upon information and
8 belief based upon materials, books, and records made available to me. If called upon to testify I could
9 and would competently testify to those facts.

10 3. Attached as Exhibit A is a true and correct copy of the July 18, 2019 Notice of
11 Bankruptcy Filing and Imposition of Automatic Stay from PG&E to Dave Alonzo's attorney, John
12 Lattin, which includes the corresponding proof of service.

13 4. Attached as Exhibit B is a true and correct copy of Dave Alonzo's March Wage
14 Statement, dated March 22, 2019, obtained from Debtors' records.

15 5. Attached as Exhibit C is a true and correct copy of Dave Alonzo's Payroll Check Request,
16 dated March 26, 2019, obtained from Debtors' records.

17 6. Attached as Exhibit D is a true and correct copy of Dave Alonzo's Vacation Payoff at
18 Term Statement, dated March 29, 2019, obtained from Debtors' records.

19 7. Attached as Exhibit E is a true and correct copy of the UPS Shipping Confirmation, dated
20 March 29, 2019, that confirms the delivery of Dave Alonzo's final check to Steve Watson, obtained
21 from Debtors' records.

22 8. Attached as Exhibit F is a true and correct copy of the PG&E "Short-Term Incentive Plan
23 Administration Standard" policy, dated May 2019, obtained from Debtors' records.

24 9. Attached as Exhibit G is a true and correct copy of Dave Alonzo's February Wage
25 Statement, dated February 22, 2019, obtained from Debtors' records.

26 10. Attached as Exhibit H is a true and correct copy of Dave Alonzo's Short-Term Incentive
27 Plan Payment, dated May 15, 2019, obtained from Debtors' records.
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I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 12, 2019

New York, New York

/s/ Richard W. Slack
Richard W. Slack